

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN RE INTUNIV ANTITRUST  
LITIGATION

This Document Relates to:  
*Direct Purchaser Actions*

Civil Action No. 16-cv-12653-ADB (Lead)

**DIRECT PURCHASER CLASS PLAINTIFFS' MOTION FOR PRELIMINARY  
APPROVAL OF SETTLEMENT WITH SHIRE, APPOINTMENT OF CLASS  
REPRESENTATIVES FOR SETTLEMENT PURPOSES, APPROVAL OF FORM  
AND MANNER OF NOTICE TO THE CLASS, APPOINTMENT OF SETTLEMENT  
ADMINISTRATOR AND ESCROW AGENT, AND PROPOSED SCHEDULE FOR  
A FAIRNESS HEARING**

Pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, direct purchaser class plaintiffs Meijer, Inc. and Meijer Distribution, Inc. ("Meijer") and Quality King Healthcare ("QK Healthcare"), individually and on behalf of the certified direct purchaser class, hereby respectfully move the Court for entry of an Order:

1. Granting preliminary approval of the proposed settlement by and between Meijer and QK Healthcare, individually and on behalf of the direct purchaser class, and defendants Shire LLC and Shire US, Inc.;
2. Appointing Meijer and QK Healthcare as class representatives solely for purposes of the settlement;
3. Approving the proposed form and manner of notice to the direct purchaser class;
4. Appointing A.B. Data, Ltd. as settlement administrator to assist in disseminating settlement notice to the direct purchaser class members and, if the settlement is granted final approval, administering distribution of the settlement fund to the direct purchaser class;
5. Appointing The Huntington National Bank as escrow agent to receive and invest the settlement funds in accordance with the terms of the escrow agreement; and
6. Adopting the proposed settlement schedule set forth in the proposed preliminary approval order, including scheduling a fairness hearing.

In support of this motion, the direct purchasers submit that the proposed settlement with Shire is fair, reasonable, and adequate and that the proposed form and manner of notice will adequately inform the class of the terms of the settlement. A detailed description of the benefits and terms of the settlement and the negotiations thereof is set forth in the supporting memorandum, declaration, and exhibits, and a proposed order is submitted herewith.

Dated: June 21, 2024

Respectfully submitted,

/s/ Thomas M. Sobol

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**CERTIFICATE OF SERVICE**

I hereby certify that, on this date, the foregoing document was served by filing it on the Court's CM/ECF system, which will deliver notification of filing to all counsel of record.

Dated: June 21, 2024

/s/ Thomas M. Sobol  
Thomas M. Sobol